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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

AUG - 7 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matters of)

NORTHLAND TELEPHONE COMPANY OF VERMONT)

File No. _____)

Notification of Inability to Comply)
With August 8, 1997 IntraLATA Toll)
Dialing Parity Implementation Deadline)

Implementation of the Local Competition)
Provisions of the Telecommunications Act)
of 1996)

CC Docket No. 96-98

TO: Chief, Common Carrier Bureau

NOTIFICATION

Northland Telephone Company of Vermont (Northland) hereby notifies the Commission that it is unable to comply with the August 8, 1997 deadline for implementation of intraLATA toll dialing parity throughout the State of Vermont. At this time, Northland believes that it will be able to implement intraLATA toll dialing parity in Vermont during the first calendar quarter of 1998.

Preliminary Matter

Northland apologizes for its inadvertent failure to submit this Notification by the May 8, 1997 date specified in Section 51.211(c) of the Commission's Rules. The intraLATA toll dialing parity requirement and May 8, 1997 implementation deadline were included in the massive First Report And Order (Implementation of the Local Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-325 and Second Report And Order And Memorandum Opinion And Order (Implementation of the Local

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Competition Provisions of the Telecommunications Act of 1996), CC Docket No. 98-98, FCC 96-333, which were adopted and released on August 8, 1996. The Commission's intraLATA dialing parity requirement and deadline do not appear to have received significant industry publicity at the time (at least, publicity that came to Northland's attention), and Northland consequently focused upon pending Vermont proceedings relating to intrastate dialing parity without realizing that the Commission had set intraLATA toll parity deadlines. When it became aware of the Section 51.211 requirement and deadline, Northland assessed its situation and prepared this notification. It asks the Bureau to accept the document, and to consider the circumstances and alternative implementation schedule set forth herein.

Background

Northland is a local exchange carrier serving eight exchanges (approximately 5,500 access lines) in rural northern Vermont. Northland acquired these exchanges from WFT Acquisition Company (WFTAC), as part of the continuation of a transaction in which WFTAC had acquired these and other exchanges from Contel of Vermont in August 1994. See Champlain Valley Telecom, Inc. et al., (DA 96-955, released June 14, 1996).

Contel had previously converted the eight exchanges to equal access on an interstate basis. Northland's local exchange customers are presently able to presubscribe to "1+" interstate toll service.

In February of 1997, ST Long Distance, Inc. dba Northland Long Distance (STLD), an affiliate of Northland, began providing interstate long distance toll service(s) within the State of Vermont.

The Vermont Public Service Board (Vermont PSB) has not yet issued any regulations or adopted any implementation schedule requiring intrastate equal access or intrastate dialing parity. It is not expected to adopt rules and implementation schedules regarding intraLATA dialing parity by independent LECs until December, 1997 at the very earliest.

**Northland Cannot Meet
The Commission's August 8, 1997 Deadline**

In order to provide full 2-PIC¹ presubscription in its Vermont exchanges, Northland needs to obtain and install hardware upgrades and multiple software packages including Release 20 software in its Alburg, Montgomery and Cabot end offices. This new hardware/software will cost over \$292,000.00, and will take over 4 months to obtain, install, test and make ready for commercial operation. Hence, if Northland were required to start the process today, it would not be able to convert to full 2-PIC operation until December 1997 at the earliest.

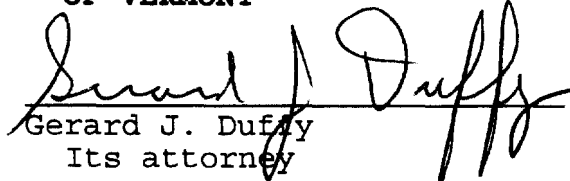
¹ The term "2-PIC" means "two presubscribed interexchange carriers," and allows customers to presubscribe to a telecommunications carrier for all interLATA toll calls, and to presubscribe to another telecommunications carrier (including, but not limited to, the customer's local exchange carrier) for all intraLATA toll calls.

Northland is also regulated by the Vermont PSB, which (as noted above) has not yet issued rules governing Northland's implementation and scheduling of intraLATA toll dialing parity. Northland does not want itself and its local exchange customers to get caught in the middle of potentially different or conflicting federal and state requirements, and believes that all parties will be best served by a one-time conversion that fully complies with both federal and Vermont dialing parity requirements.

In light of the switch upgrades it needs to complete and of the present status and prospective scheduling of the Vermont PSB proceeding, Northland believes that it can complete its conversion to full 2-PIC status within the first calendar quarter of 1998.

Respectfully submitted,

**NORTHLAND TELEPHONE COMPANY
OF VERMONT**


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